

Noncompliance Report Guide for Equipment  
**PART 573 Defect and Noncompliance Responsibility and Reports<sup>1</sup>**

**On June 25, 2008, Sonar Auto Parts Co., Ltd. [MFR] decided that a noncompliance with Federal Motor Vehicle Safety Standard No. 108 exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.**

**Date this report was prepared:** August 23, 2008

**Furnish the manufacturer's identification code for this recall (if applicable):** N/A

**1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.**

Sonar Auto Parts Co., Ltd.

881 S. Azusa Ave, City of Industry, CA 91748

**Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.**


Danny Cheung – Sonar Appointed Agent in USA

**Telephone Number:** 866-558-4264 **Fax No.:** 626-934-8885

**Name and Title of Person who prepared this report.**

Milton Yang - President

**Signed:**

  
282K AUG 2008

<sup>1</sup> Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each noncompliance condition.

**I. Identify the Recalled Items of Equipment**

**2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:**

**Generic name of the item:** Headlights, Corner Lights, Bumper Lights

**Make:** \_\_\_\_\_ **Model:**

**Part Number:** \_\_\_\_\_ **Size:**

The make, model, and part # will be attached with this letter.

**Function:**

All headlights, corner lights, and bumper lights are designed to be mounted at or near the front of the vehicle.

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

The recalled items listed do not equipped with amber reflex reflectors which the Original Equipped lamps have.

**Make:** \_\_\_\_\_ **Model:**

**Part Number:** \_\_\_\_\_ **Size:**

**Function:**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

\_\_\_\_\_  
\_\_\_\_\_

**Make:** \_\_\_\_\_ **Model:**

**Part Number:** \_\_\_\_\_ **Size:**

**Function:**

**Model Years Involved:**

**Other information which characterizes/distinguishes the items of equipment to be recalled:**

\_\_\_\_\_  
\_\_\_\_\_

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996, through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

100%

## **II. Identifying the Recall Population**

3. Furnish the total number of items of equipment recalled potentially containing the noncompliance.

<b>Items</b>		<b>Number of</b>
<b>Model</b>	<b>Year</b>	<b>Potentially</b>
<b><u>Involved</u></b>		

The items are listed in the attachment

---



---



---



---



---



---

**Total Number Potentially Affected by the Recall:**

28485 sets of headlights and 125600 sets of corners and bumper lights

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the noncompliance: 100%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:

The recall models were determined by inspection of missing amber reflex reflector as required by FMVSS108 that were sold after January 2004 to the date of this report.

### **III. Describe the Noncompliance**

**5. Describe the noncompliance. The description should address the nature and physical location of the noncompliance. Illustrations should be provided as appropriate.**

Non-compliance Headlight – The headlights listed in attachment are equipped with clear reflex reflector instead of amber reflex reflector equipped with Original Equipped headlights that were sold before January 1, 2006.

Non-compliance Corner and Bumper Lights – The corner and bumper lights listed in attachment are missing the amber reflex reflector required by FMVSS108.

---

**Describe the cause(s) of the noncompliance condition.**

The listed items are missing amber reflex reflector equipped with Original Equipped lamps.

---



---



---

**Describe the consequence(s) of the noncompliance condition.**

Missing amber reflex reflector will have the consequence that other people or driver will not see the amber reflex of the vehicle while in a dark situation. The amber reflex indicate the direction of the vehicle.

---

**Identify any warning which can (a) precede or (b) occur.**

There is no warning of missing amber reflex reflector. The amber reflex reflector are mounted at or near the front of a motor vehicle without any electrical warning sign.

**If the noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.**

The noncompliance items listed in attachment are manufacture by our factory.

**Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:**

N/A

#### **IV. Provide the Chronology in Determining the Noncompliance**

**6. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.**

After receipt of letter from NHTSA on June 16, 2008, we performed a research on the items we sold into the USA, and compare with the actual Original Equipped Lamps, we found a list of items did not equipped with amber reflex reflector as with the Original Equipped lamps have.

---

#### **V. Identify the Remedy**

**7. A description of the manufacturer's program for remedying the noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.**

Sonar will perform a recall program to purchase the noncompliance lamps from its customers or end consumers. A recall letter will be sent to Sonar's customers. The recall program will conduct a purchase of noncompliance lamps, along with reimbursing the shipping charges to the customers.

---

**8. Furnish a description of the manufacturer's remedy for the noncompliance. Clearly describe the differences between the recall condition and the remedy.**

Sonar will recall the noncompliance lamps from its customers and export back into Taiwan to resell to other countries except USA. Any used recall lamps will be destroy and scrap.

**Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.**

Sonar at the present time cannot provide the remedy replacement assembly for the noncompliance products until the new replacement assembly meet the FMVSS108 requirement. A full refund can be offered to the customers only at this time.

**Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.**

Sonar will perform a thorough inspection of the listed noncompliance items, and will correct the design and production procedure to assure the items meet all the requirement of FMVSS108.

## **VI. Identify the Recall Schedule**

**9. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.**

Sonar propose to send a recall notice to our customers through our USA distributors once our Recall Notice Letter has been approved by OVSC.

## VII. Furnish Recall Communications

**10. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to the Office of Defects Investigation by Fax (202-366-7882) for review prior to mailing.***

Most of the communication between Sonar and our customers were done by phone. However, Sonar can provide phone recap and recall notice which are attached regarding this matter.

**Note: These documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.**

---